

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NOS. 2019-224-E and 2019-225-E

IN THE MATTER OF:)	
)	
South Carolina Energy Freedom Act (H.3659))	DOCKET NO. 2019-224-E
Proceeding Initiated Pursuant to S.C. Code)	
Ann. Section 58-37-40 and Integrated Resource)	
Plans for Duke Energy Carolinas, LLC)	
_____)	
)	
IN THE MATTER OF:)	
)	
South Carolina Energy Freedom Act (H.3659))	DOCKET NO. 2019-225-E
Proceeding Initiated Pursuant to S.C. Code)	
Ann. Section 58-37-40 and Integrated Resource)	
Plans for Duke Energy Progress, LLC)	

MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL

Vote Solar hereby moves to withdraw Thadeus B. Culley, Senior Regional Director and Regulatory Counsel for Vote Solar, as counsel of record and to substitute R. Taylor Speer of the law firm Turner, Padgett, Graham, and Laney, P.A.. Effective March 1, 2021, Mr. Culley will no longer be an employee of Vote Solar. Vote Solar requests that the service list be updated to reflect this change.

Mr. Speer is an attorney licensed in South Carolina and is a member in good standing of the South Carolina State Bar (SC Bar No. 100455). Vote Solar requests that all future filings and correspondence in this proceeding be directed solely to:

R. Taylor Speer
 TURNER, PADGET, GRAHAM AND
 LANEY, P.A.
 200 East Broad Street, Suite 250
 Greenville, South Carolina, 29601
 phone: 864-552-4618
 email: tspeer@turnerpadget.com

WHEREFORE, Vote Solar prays that Mr. Culley be permitted to withdraw and
 Mr. Speer be permitted to substitute as counsel of record.

Respectfully submitted this 9th of February, 2021.

<p>VOTE SOLAR</p> <p>By: <u>/s/ Thadeus B. Culley</u> Thadeus B. Culley South Carolina Bar # 104428 1911 Ephesus Church Road Chapel Hill, NC 27517 phone: 504-616-0181 email: thad@votesolar.org</p>	<p>TURNER, PADGET, GRAHAM AND LANEY, P.A.</p> <p>By: <u>/s/ R. Taylor Speer</u> R. Taylor Speer South Carolina Bar # 100455 200 East Broad Street, Suite 250 Greenville, South Carolina, 29601 phone: 864-552-4618 email: tspeer@turnerpadget.com</p>
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Attorneys for Vote Solar

CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for
 Docket Nos. 2019-224-E and 2019-225-E, listed below, a copy of the Motion to
Withdraw and Substitute Counsel via electronic mail on this day, February 9, 2021.

By: /s/ R. Taylor Speer
 R. Taylor Speer
 South Carolina Bar # 100455

PARTIES SERVED

<p>SOUTH CAROLINA SOLAR BUSINESS ALLIANCE, INCORPORATED</p> <p>Richard L. Whitt richard@rlwhitt.law WHITT LAW FIRM, LLC 401 Western Lane, Suite E Irmo, SC 29063</p>	<p>SOUTH CAROLINA DEPARTMENT OF CONSUMER AFFAIRS</p> <p>Carri Grube Lybarker clybarker@scconsumer.gov Roger P. Hall rhall@scconsumer.gov Post Office Box 5757 Columbia, SC 29250</p>
<p>NUCOR STEEL - SOUTH CAROLINA</p> <p>Robert R. Smith, II robsmith@mvalaw.com MOORE & VAN ALLEN, PLLC 100 North Tryon Street, Suite 4700 Charlotte, NC 28202</p> <p>Michael K. Lavanga mkl@smxblaw.com STONE MATTHEIS XENOPOULOS & BREW, PC 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 20007</p>	<p>JOHNSON DEVELOPMENT ASSOCIATES, INCORPORATED</p> <p>Weston Adams, III weston.adams@nelsonmullins.com Courtney E. Walsh court.walsh@nelsonmullins.com NELSON MULLINS RILEY & SCARBOROUGH LLP Post Office Box 11070 Columbia, SC 29211</p>
<p>OFFICE OF REGULATORY STAFF</p> <p>Jeffrey M. Nelson jnelson@ors.sc.gov Andrew M. Bateman abateman@ors.sc.gov Nanette S. Edwards nedwards@ors.sc.gov 1401 Main Street, Suite 900 Columbia, SC 29201</p>	<p>SIERRA CLUB UPSTATE FOREVER NATURAL RESOURCES DEFENSE COUNCIL SOUTHERN ALLIANCE FOR CLEAN ENERGY SOUTH CAROLINA COASTAL CONSERVATION LEAGUE</p> <p>Katherine Nicole Mixson klee@selcsc.org SOUTHERN ENVIRONMENTAL LAW CENTER 525 East Bay Street, Suite 200 Charleston, SC 29403-7204</p>
<p>DUKE ENERGY CAROLINAS, LLC DUKE ENERGY PROGRESS, LLC</p> <p>Heather Shirley Smith heather.smith@duke-energy.com 40 W. Broad Street, Suite 690 Greenville, SC 29601</p> <p>Rebecca J. Dulin Rebecca.Dulin@duke-energy.com 1201 Main Street, Suite 1180 Columbia, SC 29201</p> <p>Frank R. Ellerbe III fellerbe@robinsongray.com ROBINSON GRAY STEPP & LAFFITTE, LLC Post Office Box 11449 Columbia, SC 29211</p> <p>Samuel J. Wellborn swellborn@robinsongray.com ROBINSON GRAY STEPP & LAFFITTE, LLC Post Office Box 11449 Columbia, SC 29211</p>	

TPGL 10992883v2